

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHEILA PORTER,

Plaintiff,

v.

ANDREA CABRAL, ET AL.,

Defendants.

CIVIL ACTION
NO. 04-11935-DPW

**MOTION OF GLOBE NEWSPAPER COMPANY, INC. FOR LEAVE TO FILE
REPLY BRIEF IN SUPPORT OF MOTION TO MODIFY PROTECTIVE ORDER**

Globe Newspaper Company, Inc. (the "Globe") respectfully requests leave to file a Reply Brief in support of its motion to modify the Protective Order entered in this case on March 9, 2005. (The requested Reply Brief is being filed with this Motion). As grounds for its motion, the Globe states that the Reply Brief will address the recent decision of the Third Circuit Court of Appeals in *Shingara v. Skiles*, __ F.3d __, 2005 WL 2024890 (3d Cir. 2005) -- decided after the Globe's initial memorandum was filed -- as well as briefly respond to arguments raised by the defendants in opposition to the Globe's motion. *See generally Shingara v. Skiles*, __ F.3d __, 2005 WL 2024890 (reversing order denying request to modify protective order covering discovery in civil suit involving public official defendants).

WHEREFORE, Globe Newspaper Company, Inc. respectfully requests that its motion for leave to file a Reply Brief be allowed.

OF COUNSEL:

David E. McCraw, Esq.
The New York Times Company
229 West 43rd Street
New York, NY 10036
(212) 556-4031

GLOBE NEWSPAPER COMPANY, INC.,

By its attorneys,

/s/Jonathan M. Albano
Jonathan M. Albano, BBO#013850
BINGHAM MCCUTCHEN LLP
150 Federal Street
Boston, MA 02110-1726
(617) 951-8000

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